

1 THE HONORABLE BARBARA J. ROTHSTEIN
2
3
4
5
6
7

8 **IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

9
10 JEFF GLAZE,

11 Plaintiff,

12 vs.

13 PEGASUS LOGISTICS GROUP, a
14 Texas Corporation; BLUE CROSS
15 AND BLUE SHIELD OF TEXAS, a
16 Texas Corporation; UNITED
17 HEALTHCARE SERVICES, INC.,
OPTUMHEALTH FINANCIAL
SERVICES, INC., a Delaware
Corporation

18 Defendants.

19
20 Case No. 2:22-cv-00117-BJR

21
22 **JOINT STIPULATED MOTION FOR
EXTENSION OF TIME FOR
DEFENDANTS TO FILE RESPONSIVE
PLEADING TO SECOND AMENDED
COMPLAINT AND DISCOVERY CUTOFF**

23
24
25
26 JEFF GLAZE (“Plaintiff”) and PEGASUS LOGISTICS GROUP, BLUE CROSS AND
27 BLUE SHIELD OF TEXAS, UNITED HEALTHCARE SERVICES, INC., and
OPTUMHEALTH FINANCIAL SERVICES, INC. (collectively, “Defendants”) hereby jointly
move for an extension of time for Defendants to file their responsive pleadings to the Second
Amended Complaint (Dkt. 45). The Parties collectively request an extension to Thursday,
December 8, 2022.

28 The Parties also jointly move for an extension of the discovery cutoff in this case. The
29 Parties collectively request an extension to Tuesday, February 7, 2023.

JOINT STIPULATED MOTION FOR EXTENSION OF TIME FOR
DEFENDANTS TO FILE RESPONSIVE PLEADING TO SECOND
AMENDED COMPLAINT – 1 CASE NO. 2:22-CV-00117-BJR

KILPATRICK TOWNSEND & STOCKTON LLP
1420 FIFTH AVENUE, SUITE 3700
SEATTLE, WA 98101
(206) 626-7713 FAX: (206) 260-8946

1 A proposed order is being filed in connection with this motion.
2

2 DATED this 1st day of November, 2022.

3 KILPATRICK TOWNSEND & STOCKTON LLP

4 By /s/ Gwendolyn C. Payton
5 Gwendolyn C. Payton, WSBA No. 26752
6 gpayton@kilpatricktownsend.com
7 1420 Fifth Ave., Suite 3700
Seattle, WA 98101
Telephone: (206) 626-7714
Facsimile: (206) 623-6793

8 *Counsel for Defendant Blue Cross and Blue Shield
9 of Texas Inc.*

10 HKM EMPLOYMENT ATTORNEYS LLP

11 By /s/ Joseph Wright
12 Donald W Heyrich, WSBA No. 23091
13 Joseph Wright, WSBA No. 55956
14 HKM Employment Attorneys LLP
600 Stewart Street, Suite 901
Seattle, WA 98101
206-838-2504
15 Fax: 206-260-3055
Email: dheyrich@hkm.com
Email: jwright@hkm.com

17 *Counsel for Plaintiff Jeff Glaze*

19 SANDERS COLLINS PLLC

20 By /s/ Jason L Sanders
21 Jason L Sanders (Pro Hac Vice)
325 N. St. Paul St., Suite 3100
22 Dallas, TX 75201
214-775-0631
23 Fax: 214-242-3004
Email: jsanders@sanderscollins.com

24 POLSINELLI P.C.

25 By /s/ Marc D Cabrera
26 Jessica M Andrade, WSBA No. 39297
27 Marc D Cabrera (Pro Hac Vice)
Polsinelli P.C.

1 1000 2nd Avenue, Suite 3500
2 Seattle, WA 98104
3 206-393-5415
4 Fax: 206-299-9423
5 Email: mcabrera@polsinelli.com
6 Email: jessica.andrade@polsinelli.com

7 *Counsel for Defendant Pegasus Logistics Group a*
8 *Texas Corporation*

9 DORSEY & WHITNEY

10 By /s/ Shawn J Larsen-Bright
11 Shawn J Larsen-Bright, WSBA No. 37066
12 Wendy M. Feng, WSBA No. 53590
13 701 Fifth Avenue, Suite 6100
14 Seattle, WA 98104-7043
15 206-903-8800
16 Email: larsen.bright.shawn@dorsey.com
17 Email: feng.wendy@dorsey.com

18 *Counsel for Defendants United HealthCare*
19 *Services Inc., OptumHealth Financial Services*

ORDER

Pursuant to the Stipulation,

IT IS SO ORDERED.

The Defendants shall file their responsive pleadings to the Second Amended Complaint (Dkt. 45) by Thursday, December 8, 2022.

The discovery cutoff is extended to Tuesday, February 7, 2023.

Dated this 4th day of November, 2022.

Barbara J Rothstein

THE HONORABLE BARBARA J. ROTHSTEIN